STATE OF SOUTH CAROLINA  (Caption of Case) IN RE:  APPLICATION OF AIR VOICE WIRELESS, LLC D/B/A FEELSAFE WIRELESS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF SOUTH CAROLINA			DOCKET  DOCKET  NUMBER: 2014 350 - C			
(Please type or print)	Victoria Martin		SC Bar Number:			20/18 July
Submitted by: Address:		5 Windward Concourse, Suite 150		(678)672-2831		₩3
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☐ Electric/Telecommunications ☐ Electric/Water		☐ Answer ☐ Appellate Review	Objection		Resale Agreement	л
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Administrative Matter		☐ Interconnection Agreement	ment Protest			
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July 2, 2018

### VIA FEDERAL EXPRESS

Chief Clerk of the Commission South Carolina Public Service Commission 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210 (803) 896-5100

Re: Air Voice Wireless, LLC d/b/a FeelSafe Wireless

Docket No. 2014-350-C

Dear Sir/Madam:

Pursuant to Order No. 2014-888 in the above-referenced docket, enclosed please find for filing the Company's ETC Annual Report.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self- $\int \sqrt{\Lambda}$  addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

Lance J.M. Steinhart, Esq.

Managing Attorney

Lance J.M. Steinhart, P.C.

Attorneys for Air Voice Wireless, LLC d/b/a FeelSafe Wireless

Enclosures

cc: ORS via USPS (2 copies)

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

#### **DOCKET NO. 2014-350-C**

## ETC ANNUAL REPORT OF AIR VOICE WIRELESS, LLC D/B/A FEELSAFE WIRELESS

Pursuant to 26 S.C. Code Ann. Regs. 103-690.1 and Order No. 2014-888, Air Voice Wireless, LLC d/b/a FeelSafe Wireless ("Air Voice" or "the Company"), by undersigned counsel, hereby submits its 2018 Eligible Telecommunications Carrier ("ETC") Annual Report and respectfully requests that the South Carolina Public Service Commission ("Commission") certify the Company's continued eligibility to receive federal low income support for the 2019 calendar year. Air Voice submits the following in compliance with 26 S.C. Code Ann. Regs. 103-690.1:

### I. Certification of compliance with CTIA Consumer Code (103-690.1(B)(a))

The Company certifies that it is in compliance with the CTIA Consumer Code for Wireless Service, as it is required to do pursuant to 47 C.F.R. § 54.202(a)(3). See also Exhibit A.

### II. Lifeline Reporting

#### 103-690.1(b)(3) - Requests for service that were unfulfilled

The Company is unaware of any unfulfilled requests for service from Lifeline-eligible customers for the prior calendar year.

### 103-690.1(b)(4) - Number of complaints per 1,000 handsets

The Company had 0 complaints per 1,000 handsets in the prior calendar year.

# 103-690.1(b)(5) - Certification of compliance with applicable service quality standards and consumer protection rules

The Company certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service. See also Exhibit A.

## 103-690.1(b)(6) - Certification of ability to function in emergency situations

The Company provides service by reselling the network services of AT&T Wireless ("AT&T") and certifies that it is able to remain functional in emergency situations based on 47 C.F.R. § 54.202(a)(2). The Company relies on AT&T's network reliability in all situations, including emergency situations. Through its agreement with AT&T, Air Voice provides to its customers the same ability to remain functional in emergency situations as currently provided by AT&T to its own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

## 103-690.1(b)(7) - Certification regarding provision of comparable local usage plan

The Company certifies that it offers a local usage plan comparable to that offered by the incumbent LEC ("ILEC") in the relevant service areas. The Company's offering exceeds those of the ILEC in several respects. The Company offers customers a certain amount of service free of charge. Air Voice customers can use these free minutes to place calls statewide (and even nationwide) because the Company does not constrict customers' use by imposing a local calling area requirement. The Company also provides Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting services at no cost. Air Voice's Lifeline rate plans can be found at https://www.feelsafewireless.com/terms-of-service.

### 103-690.1(b)(8) - Certification regarding equal access

The requirement to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within its designated service area has been eliminated from federal rules governing ETC designation. As such, the Company believes this requirement to no longer be applicable.

### 103-690.1(b)(9) - Number of Lifeline customers

The Company had 364 Lifeline customers as of December 31 of the prior year.

## 103-690.1(b)(10) - Copies of responses to the Lifeline Verification Survey or Certification filed with USAC

The Company has previously filed with the Commission a copy of its most recent Annual Lifeline Certification (Form 555) filed with the Universal Service Administrative Company ("USAC"). The deadline for filing the FCC Annual Report (Form 481) was extended to July 16, 2018, and Air Voice will provide a copy to the Commission once available.

Respectfully submitted,

Lance J.M. Steinhart

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Attorneys for Air Voice Wireless, LLC d/b/a FeelSafe Wireless

### EXHIBIT A

### CERTIFICATION

	•	AFFIDAVIA
STATE OF MICHIGAN		)
COUNTY OF OAKLAND		)

Personally came and appeared before me, the undersigned Notary, the within named Jim Bahri, CEO of Air Voice Wireless, LLC d/b/a FeelSafe Wireless ("the Company"), and makes this his statement and Affidavit upon oath and affirmation of belief and personal knowledge that the matters, fact and things set forth in the foregoing report are true and correct to the best of his knowledge.

Jim Bahri, CEO

Air Voice Wireless, LLC d/b/a FeelSafe Wireless

SWORN TO and subscribed before me, the undersigned Notary Public, the 21 st day of JUNC. 2018.

My Commission expires () CT

Notary Public

MELISSA KALLABAT Notary Public - Michigan **Oakland Gounty** My Commission Expires Oct 6, 2020 Acting in the County of DAKLANE